

1133 Avenue of the Americas Suite 1500 New York, New York 10036

(212) 316-9500 rkaplan@kaplanmartin.com

June 24, 2025

## BY CM/ECF

The Honorable Lewis J. Liman United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Metro. Transp. Auth., et al. v. Duffy, et al., No. 25 Civ. 1413 (LJL)

Dear Judge Liman:

I write on behalf of Plaintiffs the Metropolitan Transportation Authority and Triborough Bridge and Tunnel Authority. Counsel for the parties have conferred and agree that Local Civil Rule 56.1 does not apply to the forthcoming motions for summary judgment. *See* L. Civ. R. 56.1(a) ("This rule does not apply to claims brought under the Administrative Procedure Act[.]"). We write to confirm that this course of action is consistent with Your Honor's expectations.

Respectfully submitted,

Roberta A. Kaplan

cc: Counsel of Record (via ECF)